

The Russian River Watershed Association  
P.O. Box 11628  
Santa Rosa, CA 95406

Paul L. Kelley  
Chairman

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September 28, 2004

Ms. Tracie Billington  
Division of Planning and Local Assistance  
Department of Water Resources  
P. O. Box 942836  
Sacramento, CA 94236-0001

RE: INTEGRATED REGIONAL WATER MANAGEMENT GRANT PROGRAM  
GUIDELINES

Dear Ms. Billington:

On behalf of the Board of Directors of the Russian River Watershed Association, I am pleased to offer comments on the proposed guidelines for grant programs for integrated regional water management (IRWM) plans under Chapter 8 of Proposition 50 dated August, 2004. I would also like to commend the staff members of the Department of Water Resources and the State Water Resources Control Board for developing a very thorough and effective guidelines document.

Comments on the Proposed Guidelines

**1. Local Matching Fund Requirements (Section II. C.):** The state intends to require local matching funds of 50% for planning grants and 10% for total projects. We support the local matching fund requirement as stated in the guidelines and would like to confirm that local expenditures directly related to developing the IRWM Plan or implementing a project under the plan and incurred since voter approval of Proposition 50 in 2002 can be included as part of the local match. We also ask that any federal funding available for the project also be considered as local matching funds under the program.

**2. Statewide Priorities (Section II. E.):** The guidelines indicate that preference will be given to projects that assist in meeting statewide priorities as listed. We recommend that the list of statewide priorities be expanded to include the following:

- Increase the security and reliability of water sources for urban, agricultural, and environmental uses.
- Protect and restore wetlands and habitat for threatened or endangered fish species.

**3. Eligible Grant Recipients (Section III. A.):** The guidelines encourage formation of partnerships to enhance integration of water management throughout the regions. Alternatives for collaboration should also include partnerships based on letters or memoranda of mutual

understanding as long as those documents have been approved by the boards or councils of appropriate agencies. (Similar language is used to describe regional water management groups under definitions, Appendix D.)

A state agency may be the most appropriate entity to submit an application for some projects in certain regions. We support the concept that state agencies will be eligible to apply for grants under this program when they are part of a local partnership or regional water management group and can demonstrate strong local participation in the proposed project.

**4. Eligibility Requirements (Section III. B.):** Proposed guidelines require that applications for implementation projects be consistent with an adopted IRWM plan. A waiver is allowed if the applicant can show that a plan will be adopted by 1/1/2007 and the project contributes to objectives of a draft IRWM plan. We support the state in granting waivers for applicants that demonstrate a list of plan objectives and include a schedule for completion of a plan by 1/1/07. We would ask that no further conditions or requirements for a waiver be added.

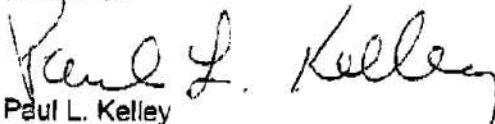
**5. Applicant Authority (Appendix B.1.B. and Appendix C.3.B.):** We anticipate that members of a regional water management group (group) as currently defined may wish to apply for a grant on behalf of the group or members of the group. Lack of a formal agreement among partners to ensure project performance and tracking of funds should not disqualify the applicant or cause rejection of their application. Such an agreement, if needed, could be required as a condition of funding if the proposal is selected for a grant.

#### Russian River Watershed Association

The Russian River Watershed Association is an association of ten cities, counties and special districts formed to protect and restore watershed resources and facilitate regulatory compliance on a watershed or regional basis. The cities of Santa Rosa, Ukiah, Healdsburg, Cloverdale, Rohnert Park, the Town of Windsor, the County of Sonoma, the Sonoma County Water Agency, the Mendocino County Water Agency, and the Mendocino County Inland Water and Power Commission participate in RRWA and are represented on our Board of Directors.

Thank you again for your consideration of these comments. If you have questions or require further information from RRWA, please call me.

Sincerely,



Paul L. Kelley  
Chair, Russian River Watershed Association, and  
Sonoma County 4<sup>th</sup> District Supervisor